



BUREAU OF WATER
OFFICE OF

FEB 04 2010

***** Via Fax and Post *****

February 3, 2010

Mr. Paul Stacey
Bureau of Water Protection
CT Department of Environmental Protection
79 Elm St.
Hartford, CT 06106

Re: Support and Recommendations for Proposed Streamflow Regulations

The League of Women Voters of Connecticut, a statewide organization with approximately 2100 members, has a strong position in support of policies and programs that protect our state's watercourses and watershed lands. **Based upon this longstanding position, the League strongly supports the stated purpose of the proposed streamflow standards and regulations to provide for the protection of Connecticut's rivers and streams amid the many competing uses such as drinking water, public safety, irrigation and wildlife.**

Although we agree with the stated purpose, we concur with the analysis and recommendations of the Connecticut Fund for the Environment on recommended changes. Specifically, LWVCT supports CFE's recommendations to:

- **amend the definition of river or stream system**
- **clarify and reserve DEP authority during the phase-in period**
- **add more specificity in standards for enforcement**
- **refine classification provisions: include presumption against "downgrading", conversely to allow the classification to be brought back up and finally to eliminate the Class 4 designation which would essentially "write-off" the river from any future restoration efforts.**

The League of Women Voters of Connecticut was among the co-sponsors of the 2005 Conference "*Water Law In Connecticut: Balancing Needs for Fish and Faucet.*" Attendees and featured speakers represented an array of stakeholders from local and state officials, to water utility representatives, to land use lawyers, to environmental advocates. As one speaker noted, regardless of the divergent perspectives, everyone seemed dissatisfied with the current situation. All seemed to agree that Connecticut has an essential, yet limited, resource and allocates it through a patchwork of policies that don't fit very well together. The League commends DEP for proposing a comprehensive set of standards and regulations that, with the above proposed changes, will provide a clear framework for the protection and allocation of our state's water resources.

Sincerely,

Cheryl Dunson
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Cheryl Dunson
Vice President, Public Issues